

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
JODIE T. HOANG	*	
	* * *	

Should this matter have gone to trial, the government would have proved through the introduction of competent testimony and admissible tangible exhibits, including documentary evidence, the following to support the allegations charged by the government in the one count bill of information now pending against the defendant, **JODIE T. HOANG**.

The defendant, **JODIE T. HOANG**, was an accounting clerk at Standard Mortgage Corporation, located in New Orleans, Louisiana. Standard Mortgage Corporation originates and services residential loans, fifteen percent of which are located outside of the State of Louisiana. Standard Mortgage Corporation had in place a computer system which contained accounting software systems used in the production and maintenance of mortgages. This computer system affected interstate commerce and was therefore a protected computer.

Part of defendant, **JODIE T. HOANG'S** duties as an accounting clerk was to process funds received by Standard Mortgage Corporation at loan closings. Separate interest and escrow payments were received by Standard Mortgage Corporation at the loan closings. Interest was normally coded in the general ledger as "interest income" and represented a profit for Standard Mortgage Corporation. Escrow payments established the purchaser's escrow account and were coded in the general ledger as "Collection Clearing," a balance sheet item to be paid later to the Mortgage Servicing Department. Using the computer system **HOANG** changed the deposit code for numerous interest payments from "interest income" to "Collection Clearing," **HOANG** paid the Mortgage Servicing Department the appropriate amount which they expected to receive for the escrow payments. **HOANG** then created checks payable to herself or her credit cards from funds she had previously coded as "Collection Clearing." These checks required two signatures. **HOANG** had these checks signed by acquiring the signature stamp used by another accounts payable clerk. The second signature on the checks was a computer generated signature of the Chief Financial Officer. As the individual responsible for reconciling Standard Mortgage Corporation's general operating account, **HOANG** separated and concealed all cancelled checks received from Bank One which had been made payable to herself or on her behalf.

From in or about September 2001 and continuously thereafter until in or about August 2004, in the Eastern District of Louisiana and elsewhere. **JODIE T. HOANG**, defendant herein, did knowingly and with intent to defraud, access a protected computer exceeding her authorized access, and by means of such conduct furthered the intended fraud and obtained something of value, \$1,029,978.28 belonging to Standard Mortgage Corporation thereby affecting the Standard Mortgage Corporation's database, a protected computer; in violation of Title 18 United States Code, Section 1030(a)(4).

JODIE HOANG
Defendant

PIUS A. OBIOHA, ESQ.
Counsel for Defendant

CARTER K. D. GUICE, JR.
Assistant United States Attorney